

1 **JENNIFER BERGH**
2 jbergh@qslwm.com
3 Nevada Bar No. 14480
4 **QUILLING SELANDER LOWNDS**
5 **WINSLETT & MOSER, P.C.**
6 2001 Bryan St., Suite 1800
7 Dallas, TX 75201
8 (214) 560-5460
9 (214) 871-2111 Fax
10 *Counsel for Trans Union LLC*

11 **Designated Attorney for Personal Service**
12 Trevor Waite, Esq.
13 Nevada Bar No.: 13779
14 6605 Grand Montecito Parkway, Suite 200
15 Las Vegas, NV 89149

16 **IN THE UNITED STATES DISTRICT COURT**
17 **FOR THE DISTRICT OF NEVADA**

18 DIAHANN POZOS-MALETTA,
19 Plaintiff,

20 v.
21 EQUIFAX INFORMATION SERVICES,
22 LLC, TRANSUNION, LLC, WESTERN
23 FEDERAL CREDIT UNIONS and
24 NORDSTROM/TD BANK USA,
25 Defendants.

26 Case No. 2:20-cv-00242-JCM-NJK

27 **DEFENDANT TRANS UNION LLC'S**
28 **FOURTH UNOPPOSED MOTION FOR**
29 **EXTENSION OF TIME TO REPLY TO**
30 **PLAINTIFF'S RESPONSE TO**
31 **DEFENDANT'S MOTION TO DISMISS**

32 Defendant Trans Union LLC ("Trans Union"), by counsel, files its Fourth Unopposed
33 Motion for Extension of Time to Reply to Plaintiff's Response to Defendant's Motion to Dismiss
34 and would respectfully show the Court as follows:

35 **I. BACKGROUND**

36 1. On February 4, 2020, Plaintiff Diahann Pozos-Maletta ("Plaintiff") filed an
37 original complaint ("Complaint"). In response, Trans Union filed its Motion to Dismiss
38 Plaintiff's Complaint, Dkt. 5.

39 2. Plaintiff then filed a Response in Opposition to Trans Union LLC's Motion to
40 Dismiss Complaint on March 30, 2020, Dkt 22. Trans Union's deadline to reply to Plaintiff's
41 Response is May 18, 2020.

II. RELIEF REQUESTED

3. Trans Union seeks a 14-day extension of the deadline to file its Reply to Plaintiff's Response.

4. Good cause exists for Defendant's extension as Trans Union needs additional time to review the numerous arguments made in Plaintiff's 11-page Response, to review the case law cited therein, and to prepare its Reply. In addition, Plaintiff and Defendant TransUnion have been actively engaged in settlement discussions and believes there is a good chance the matter will be imminently resolved without the need to incur additional costs and expenses. Settlement negotiations have required additional time as a result of COVID-19 and the related delays caused as all parties adjust to working remotely, which include but are not limited to difficulty accessing necessary documents. The Plaintiff and Defendant are close to settlement and do not anticipate any further request for an extension. This is Defendant's fourth request.

5. Plaintiff is not opposed to the requested extension and no party will be prejudiced thereby. The extension is not requested for delay and will not impact any other deadline in the Court's Scheduling Order.

Wherefore, Trans Union respectfully requests this Court issue an Order extending the deadline for Trans Union to file its Reply to Plaintiff's Response to June 1, 2020.

Dated this 19th day of May 2020.

/s/ *Shawn W. Miller*

SHAWN W. MILLER

smiller@kriegerlawgro

DAVID H. KRIEGER

dkrieger@hainesandkrieger.com

KRIEGER LAW GR

2850 W. Horizon
House 1

Henderson, NV 89052
(702) 848-3855
Counsel for Plaintiff

/s/ *Jennifer Bergh*

JENNIFER BERGH

jbergh@qslwm.com

Nevada Bar No. 14480

QUILLING SELANDER LOW

WINSLETT & MOSER,

2001 Bryan St., Suite 11
Dallas, TX 75201

Dallas, TX 75201
(214) 560-5460

(214) 500-5460
(214) 871-2111 Fax

IT IS SO ORDERED. May 22, 2020.

IT IS SO ORDERED
James C. Mahan
HONORABLE JAMES C. MAHAN
UNITED STATE DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of May 2020, I electronically filed **DEFENDANT TRANS UNION LLC'S FOURTH UNOPPOSED MOTION FOR EXTENSION OF TIME TO REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO DISMISS** with the Clerk of the Court using the CM/ECF system which will then send a notification of such to the following counsel of record:

Shawn W. Miller
smiller@kriegerlawgroup.com
David H. Krieger
dkrieger@hainesandkrieger.com
Krieger Law Group, LLC
2850 W. Horizon Ridge Pkwy., Suite 200
Henderson, NV 89052
(702) 848-3855
Counsel for Plaintiff

Brett P. Ryan
Brett.Ryan@UnifyFCU.com
7935 W. Sahara Ave., Suite 201
Las Vegas, NV 89117
(310) 783-5957
Counsel for Western Federal Credit Union

Jeremy J. Thompson
jthompson@clarkhill.com
Clark Hill PLLC
3800 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169
(702) 862-8300
(702) 862-8400 Fax
***Counsel for Equifax Information Services,
LLC***

Tyson E Hafen
tehafen@duanemorris.com
Duane Morris LLP
100 North City Pkwy., Suite 1560
Las Vegas, NV 89106
(702) 868-2655
(702) 385-6862 Fax
Counsel for Nordstrom and TD Bank USA

/s/ Jennifer Bergh
JENNIFER BERGH